

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Criminal Division**

**UNITED STATES**

**v.**

**JOSHUA SMITH**

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**Case No.: 1:15-MJ-00608-JFA-3**

**MOTION REQUESTING DEFENDANT'S RELEASE TO  
LISA MCKAMEY AS A THIRD PARTY CUSTODIAN AND REQUEST FOR HEARING**

COMES NOW, Defendant, Joshua Smith, by and through undersigned Counsel, Bruce A. Johnson, Jr., requests that this Honorable Court appoint his mother, Lisa McKamey, as his third party custodian. In support thereof, the Defendant avers as follows:

1. Mr. Smith is charged with, Using, Carrying, and Brandishing a Firearm during and in Relation to a Crime of Violence. It was apparent that Defendant's involvement in the alleged robbery was minimal, at best.

2. On December 11, 2015, after obtaining information on the offense and Mr. Smith's background, the Honorable Judge John F. Anderson ordered that Mr. Smith could be released to a Third Party Custodian under certain conditions. The Defendant's mother, Lisa McKamey, is a suitable Third Party custodian.

3. Ms. Lisa McKamey is a healthy, forty-five (45) year old woman with no criminal history or pending cases. She currently resides at 7003 Independence Street, Capitol Heights, Maryland 20745, where she has resided for over a year.

4. Ms. McKamey is currently enrolled at the Hair Academy in Capitol Heights, Maryland and works for Javitan Coffee.

5. Mr. Smith resided with his mother until he turned twenty one (21) years old, a little over a year ago, and decided to move in with his cousin in Washington, D.C. While living with his mother Mr. Smith did not have any serious issues or problems with the law.

6. Ms. McKamey will ensure that there are no firearms within the residence, that he is actively searching for employment, that he makes all of his court appearance and that he is otherwise in complete compliance with the terms and conditions the Court sets.

WHEREFORE, for the aforementioned reasons, Defendant, Joshua Smith, respectfully requests that this Honorable Court release him into the custody of Lisa McKamey.

Respectfully Submitted,

BRUCE A. JOHNSON JR., LLC

\_\_\_\_\_/s/\_\_\_\_\_  
Bruce A. Johnson, Jr. (#36910)  
4301 Northview Drive  
Bowie, Maryland 20716  
(301) 860-1505  
(301) 860-1507 (f)  
*Counsel for the Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion Requesting Defendant's Release to Lisa McKamey as a Third Party Custodian was hand- delivered this 17<sup>th</sup> day of December 2015, to:

Rebecca Bellows, Esquire  
Office of the United States Attorney  
For the Eastern District of Virginia  
2100 Jameison Avenue  
Alexandria, VA 22314

Shannon Quill, Esquire  
Office of the Federal Public Defender  
1650 King Street, Suite 500  
Alexandria, VA 22314  
*Attorney for Corey Rogers*

Robert V. Bryan, Jr., Esquire  
Bryan Law PLC  
10432 Balls Ford Road, Suite 300  
Manassas, VA 20109  
*Attorney for Delante Turner*

\_\_\_\_\_  
/s/  
Bruce A. Johnson, Jr.

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**ORDER**

UPON CONSIDERATION of the Defendant's Motion Requesting Appointment, and any response thereto, it is this \_\_\_\_ day of \_\_\_\_\_ 2015 hereby;

ORDERED, that the Motion Requesting Appointment is GRANTED, and it is

FURTHER ORDERED, that Lisa McKamey is hereby appointed third party custodian.

\_\_\_\_\_  
Judge John F. Anderson  
For the United States Eastern District of Virginia

copies to:

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